

Pearce, Jennifer

From: Weiss, Lena
Sent: Thursday, October 06, 2016 3:18 PM
To: Pearce, Jennifer
Subject: FOIA Req EPA R4 2016 010483
Attachments: Kings Bay_QAPP_SAP_28DEC2015SigPage.pdf

-----Original Message-----

From: Lassiter, James SAJ [mailto:James.A.Lassiter@usace.army.mil]
Sent: Monday, December 28, 2015 10:53 AM
To: Weiss, Lena <Weiss.Lena@epa.gov>
Cc: Collins, Gary <Collins.Garyw@epa.gov>
Subject: RE: Kings Bay SAP/QAPP 103 Sampling Maps (UNCLASSIFIED)

CLASSIFICATION: UNCLASSIFIED

Good morning Lena,

Attached is the signature page for the KB SAP/QAPP. Let me know if you have any questions, I'll be in the office at least Tuesday and Wednesday of this week as well.

Thank you,

Aaron Lassiter
Planning and Policy Division
904.232.3642

-----Original Message-----

From: Weiss, Lena [mailto:Weiss.Lena@epa.gov]
Sent: Tuesday, December 22, 2015 3:03 PM
To: Lassiter, James SAJ <James.A.Lassiter@usace.army.mil>
Subject: [EXTERNAL] RE: Kings Bay SAP/QAPP 103 Sampling Maps (UNCLASSIFIED)

Thanks Aaron!
Lena

-----Original Message-----

From: Lassiter, James SAJ [mailto:James.A.Lassiter@usace.army.mil]
Sent: Tuesday, December 22, 2015 3:02 PM
To: Weiss, Lena <Weiss.Lena@epa.gov>
Subject: RE: Kings Bay SAP/QAPP 103 Sampling Maps (UNCLASSIFIED)

CLASSIFICATION: UNCLASSIFIED

Good afternoon Lena,

I've also sent you and Gary the updated surveys for the Inner and Entrance Channel via the ftp site for your records

Thank you,

Aaron Lassiter
Planning and Policy Division
904.232.3642

-----Original Message-----

From: Weiss, Lena [mailto:Weiss.Lena@epa.gov]
Sent: Tuesday, December 22, 2015 8:06 AM
To: Lassiter, James SAJ <James.A.Lassiter@usace.army.mil>
Subject: [EXTERNAL] RE: Kings Bay SAP/QAPP 103 Sampling Maps (UNCLASSIFIED)

Good morning Aaron -

Thank you for sending us the maps. Can you please go ahead and begin a signature page for the SAP and then send it over? You and someone from ERDC should sign before we do. Additionally, I think you might have to change it from the way it is currently formatted to have me as the EPA PM and Gary as the QA Manager.

Thanks so much,
Lena

-----Original Message-----

From: Lassiter, James SAJ [mailto:James.A.Lassiter@usace.army.mil]
Sent: Monday, December 21, 2015 4:53 PM
To: Weiss, Lena <Weiss.Lena@epa.gov>; Collins, Gary <Collins.Garyw@epa.gov>
Subject: Kings Bay SAP/QAPP 103 Sampling Maps (UNCLASSIFIED)
Importance: High

CLASSIFICATION: UNCLASSIFIED

Good afternoon Lena,

I have posted the sampling location maps to our Army FTP site for your access. I had to make them largely myself, so they are not quite as aesthetically pleasing as some of our contractor productions. They are formatted to print 11x17 as well, so the font won't get too small. You'll get an email with the instructions to retrieve them shortly. Let me know if you have any question about them. Also, the latest schedule for the 103 sampling is now either the first or second week of January.

Best,

Aaron Lassiter
Physical Scientist
US Army Corps of Engineers
Jacksonville, FL
904.232.3642

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Kings Bay
2015 Evaluation of Dredged Material for Ocean Disposal
Sampling Plan and Protocol

GROUP A. PROJECT MANAGEMENT

1.0 ELEMENT A1 - TITLE AND APPROVAL SHEET

Organization/Applicant: USACE Jacksonville District

Project Manager/Technical POC: J. Aaron Lassiter

Signature: 

Date: 12/22/2015

Regulatory: Beverlee Lawrence

Signature: 

Date: 12/22/2015

Regulatory Agency: USEPA Region 4

Project Manager: Lena Weiss

Signature: _____

Date: _____

QA Manager or Designated Approving Official: Gary Collins

Signature: _____

Date: _____

Testing: USACE ERDC-Vicksburg

Project Manager: Alan Kennedy

Signature: KENNEDY.ALAN.JA
MES.1267776462

Digitally signed by
KENNEDY.ALAN.JAMES.1267776462
DN: c=US, o=U.S. Government, ou=DoD, ou=PKI,
ou=USA, cn=KENNEDY.ALAN.JAMES.1267776462
Date: 2015.12.24 22:41:20 -06'00'

Date: _____

QA Officer: Dale Rosado, US Army Engineer Research and Development Center

Signature: ROSADO.DALE.ANTHON
Y.JR.1502867829

Digitally signed by ROSADO.DALE.ANTHONY.JR.1502867829
DN: c=US, o=U.S. Government, ou=DoD, ou=PKI, ou=USA,
cn=ROSADO.DALE.ANTHONY.JR.1502867829
Date: 2015.12.28 08:26:13 -06'00'

Date: _____

Pearce, Jennifer

From: Weiss, Lena
Sent: Thursday, October 06, 2016 3:17 PM
To: Pearce, Jennifer
Subject: FOIA Req EPA R4 2016 010483
Attachments: SAJ Response to EPA KB SAP_QAPPcomments10DEC15.docx; Kings Bay_draft QAPP SAP Sept2015_AL_AK20Oct15_revised_EPAComments_8DEC2015.docx

Importance: High

-----Original Message-----

From: Lassiter, James SAJ [mailto:James.A.Lassiter@usace.army.mil]
Sent: Thursday, December 10, 2015 9:45 AM
To: Weiss, Lena <Weiss.Lena@epa.gov>
Cc: Collins, Gary <Collins.Garyw@epa.gov>
Subject: RE: Kings Bay SAP\QAPP (UNCLASSIFIED)
Importance: High

CLASSIFICATION: UNCLASSIFIED

Good morning Lena,

Please find attached responses to EPA's comments as well as the updated SAP/QAPP document. As soon as the maps are completed, I'll send them your way, as well as the most recent survey's. Let me know if you have any questions.

Thank you,

Aaron Lassiter
Planning and Policy Division
904.232.3642

-----Original Message-----

From: Weiss, Lena [mailto:Weiss.Lena@epa.gov]
Sent: Thursday, December 10, 2015 7:39 AM
To: Lassiter, James SAJ <James.A.Lassiter@usace.army.mil>
Cc: Collins, Gary <Collins.Garyw@epa.gov>
Subject: [EXTERNAL] RE: Kings Bay SAP\QAPP (UNCLASSIFIED)

Fine with me!
Lena

-----Original Message-----

From: Lassiter, James SAJ [mailto:James.A.Lassiter@usace.army.mil]
Sent: Wednesday, December 09, 2015 4:46 PM
To: Weiss, Lena <Weiss.Lena@epa.gov>
Cc: Collins, Gary <Collins.Garyw@epa.gov>
Subject: Kings Bay SAP\QAPP (UNCLASSIFIED)

CLASSIFICATION: UNCLASSIFIED

Good afternoon Lena,

We have addressed your and Gary's comments on the SAP/QAPP. I am still waiting on our engineer to create the maps depicting the sampling locations however. I was wondering if you would be amenable to us sending you the edits and responses now and the maps as soon as available. We understand that you cannot sign off on the Plan until the submittal is complete, but thought this could save some us some time prior to the holidays. Let me know if this would be okay and I'll forward your way.

Thanks,

Aaron Lassiter
Physical Scientist
US Army Corps of Engineers
Jacksonville, FL
904.232.3642

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RESPONSE TO KINGS HARBOR COMMENTS

Please find our itemized, point-by-point response to comments below. For your reviewing expediency and to avoid a complete re-review of the document, we have highlighted altered text yellow and provided specific line numbers, section numbers, table numbers, figure numbers, etc.

RESPONSE TO GENERAL COMMENTS

1. The proposed sampling stations need to be plotted on the bathymetric maps in order to determine if stations are representative of shoaling patterns
 - a. **RESPONSE:** Please refer to the updated sample zone maps in Attachment A.
2. Both Gary and I felt as though the information provided in the site description was inadequate, and would have benefited from a more thorough discussion of land-and water-based activities in the general project area
 - a. **RESPONSE:** Additional details have been added within sections 5.1.1 and 6.1.1 (lines 393-396 and 506 – 512).
3. No rationale for sampling/survey design is provided, just a description.
 - a. **RESPONSE:** Section 10.1.1 has been modified to include the rationale for sampling (lines 737-738, 754-775, and 789-808).
4. Section 10.1.1.: Rationale for design states that Zone 2 qualifies under exclusionary criteria 40 CFR S.227.13(b)(1) and consists of a majority of USCS class SM material with 12-50% silt. This class of sediment does not qualify under the criteria listed above, and is inconsistent with the MPRSA 103 evaluation from 2011, which documents that Range C and the North Settling Basin are predominantly sand (SP), with greater than 95% sand, which does meet the exclusionary criteria. Additionally, based on the location and hydrography of Zone 5, as well as the results of previous testing, it is recommended that this zone qualifies for exclusion from further testing under 40 CFR S. 227.13 (b)(3) rather than 40 CFR S.227(b)(1)
 - a. **RESPONSE:** Section 10.1.1 has been updated to reflect the correct exclusionary criteria reference.
5. Zone compositing of tissue samples should not occur without written approval from EPA
 - a. **RESPONSE:** We agree. The footnotes below Table 14 have been modified accordingly (lines 930-31).
6. Page 67 discusses procedures for pre-test tissues, however, based on the sampling scheme, it does not appear as though pre-testing will occur
 - a. **RESPONSE:** Analysis of unexposed tissue (pre-testing) for background contaminant levels will occur. This was described in the bioaccumulation section (lines 1485 - 1487) but it was not previously itemized in Table 4 or Table 14 (see footnotes). Only the zones were listed. These tables have been edited to include pre-test tissue.

RESPONSE TO CHECKLIST COMMENTS – COLLINS

1. Permit valid through 2018
 - a. **RESPONSE:** none required.
2. Virtually no information @ land or water-based activities in general area
 - a. **RESPONSE:** See response (#2) to Weiss (general comments above).
3. Is hydrographic survey completed within 90 days? July 2015.

- a. **RESPONSE:** The most recent survey was completed in September 2015. The SAP, section 10.3 has been updated accordingly, as well as the sampling maps in Attachment A.
4. Checklist #5. Are sampling locations representative of shoaling and expected contamination sources? Appears to be but hard to be sure since locations are not plotted on bathymetric maps
 - a. **RESPONSE:** Please refer to updated Zone and sample location maps in Attachment A.
5. Checklist #11. Is the compositing rationale fully described?
 - a. **RESPONSE:** Regarding tissue compositing, there was a footnote under the analytical Table 14 that stated zones may be composited prior to analysis. This may be where there concern about tissue compositing is directed. The footnotes under the table have been revised accordingly, as previously discussed.

RESPONSE TO CHECKLIST COMMENTS – WEISS

1. Total volume of dredged material is not provided. From adding figures listed in Table 2, total volume of dredged material is approximately 2,335,000 cubic yards.
 - a. **RESPONSE:** Table 10 has been updated to reflect the total estimated dredge volume.
2. Site description is present, but is lacking in detail.
 - a. **RESPONSE:** Please see response to general comments, No. 2 above.
3. Hydrographic survey completed July 2015.
 - a. **RESPONSE:** Please see Collins #3 response above.
4. Sampling Zone 2 encompasses a very large amount of dredged material (1,030,000 cy). Based on the shape of the channel, it would be beneficial to split Zone 2 into two sampling zones, which seem to have slightly different sediment and hydrographic characteristics (see map, attached). Both zones appear to meet exclusionary criteria.
 - a. **RESPONSE:** Zone 2 has been subdivided as suggested and updated throughout the SAP.
5. Compositing rationale is not fully described or explained. Sample zones should not be composited during tissue testing.
 - a. **RESPONSE:** Agreed. See responses to General comment #5 and checklist item 11. Text revised accordingly.
6. 10.1.1.: Rationale for design states that Zone 2 qualifies under exclusionary criteria 40 CFR S.227.13(b)(1) and consists of a majority of USCS class SM material with 12-50% silt. This class of sediment does not qualify under the criteria listed above, and is inconsistent with the MPRSA 103 evaluation from 2011, which documents that Range C and the North Settling Basin are predominantly sand (SP), with greater than 95% sand, which does meet the exclusionary criteria. Additionally, based on the location and hydrography of Zone 5, as well as the results of previous testing, it is recommended that this zone qualifies for exclusion from further testing under 40 CFR S. 227.13 (b)(3) rather than 40 CFR S.227(b)(1).
 - a. **RESPONSE:** See response to General comment #4.
7. No analysis of pre-test tissues
 - a. **RESPONSE:** Background tissues will be analyzed. See response to General comment #6.
8. Checklist item #11. Are the detection limits expressed in wet weight for tissues? Not specified

- a. **RESPONSE:** Tissue data are to be reported as wet weight. This is specified in Table 17 and the text box under Section 13.3.1. Additionally, we have added an indication that wet weight basis will be used in Table 4.
- 9. Sediments from Entrance Channel Cut 1N including Turning Basin Station 0+00 to 200+00 and Northern Settling Basin (St. 119+00 to 227+50) were last sampled in 2009. Given a 3-year concurrence period, it might be beneficial to conduct physical sampling in this portion of Zone 2.
 - a. **RESPONSE:** For the purposing of this evaluation we recommend using historic information to exclude this zone. No physical samples for this portion of Zone 2 were deemed to be necessary at this time. The SAP has been updated to reflect the splitting of Zone 2
- 10. Dredging units need to be ranked (Exclusionary, Low, Moderate, High) based on previous sampling and site-specific concerns.
 - a. **RESPONSE:** Sampling zones have been ranked and are found in Section 10.1.1 (lines 789-798 and Table 10).

